

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
MONTGOMERY DIVISION**

JENNIFER P. CLARK,)
Plaintiff,)
VS.)
CIVIL ACTION NO. 2:08CV-173-MHT
JASON J. DEAL and)
E. PAUL STANLEY,)
Defendants.)

MOTION FOR ADMISSION *PRO HAC VICE* OF CHRISTI DICKSON FEENEY

COMES NOW the undersigned, Christi Dickson Feeney (“Applicant”), and files this Motion for Admission *Pro Hac Vice*, accompanied by her Affidavit in support of this Motion, a true and correct copy of which is attached hereto as Exhibit “A,” and respectfully requests the following:

1. Applicant resides at 640 Hillpine Drive, Atlanta, Georgia 30306, Telephone 404-614-7462.
2. Applicant is an attorney and a member of the law firm of Hawkins & Parnell, LLP with offices at 303 Peachtree Street, NE, Suite 4000, Atlanta, Georgia 30308, Telephone 404-614-7462, Fax 404-614-7500. *See* Verified Affidavit of Christi Dickson Feeney in Support of Motion for Admission *Pro Hac Vice*, a true and correct copy of which is attached hereto as Exhibit "A."

3. Applicant's law firm, Hawkins & Parnell, LLP, has been retained by Defendant E. Paul Stanley s to provide legal representation in connection with the above case now pending in this Court.
4. Since 1996 Applicant has been, and presently is, a member in good standing of the bar of the highest court of the State of Texas, where she regularly practices law. Attached is a Certificate of Good Standing. *See* Certificate of Good Standing from the State Bar of Texas, a true and correct copy of which is attached hereto as Exhibit "B."
5. Since 2003 Applicant has been, and presently is, a member in good standing of the bar of the highest court of the State of Tennessee, where she regularly practices law. Attached is a Certificate of Good Standing. *See* Certificate of Good Standing from the State Bar of Tennessee, a true and correct copy of which is attached hereto as Exhibit "C."
6. Since 2006 Applicant has been, and presently is, a member in good standing of the bar of the highest court of the State of Georgia, where she regularly practices law. Attached is a Certificate of Good Standing. *See* Certificate of Good Standing from the State Bar of Georgia, a true and correct copy of which is attached hereto as Exhibit "D."
7. Applicant has been admitted to practice before the following Courts, and is presently a member in good standing of the bars of the following Courts:

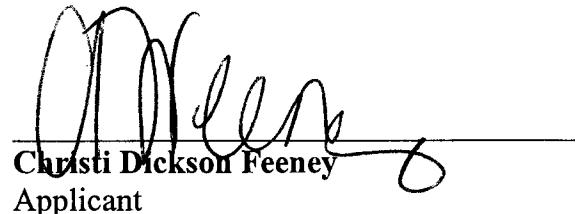
<u>Court:</u>	<u>Admitted:</u>
State Bar of Texas	1996
United States District Court for the Northern District of Texas	1997
United States District Court for the Southern District of Texas	2001
United States District Court for the Eastern District of Texas	2002
United States Court of Appeals for the Fifth Circuit	2002

United States District Court for the Western District of Texas	2003
State Bar of Tennessee	2003
State Bar of Georgia	2006

8. Applicant has never had an application for admission *Pro Hac Vice* in this or any other jurisdiction denied or any *Pro Hac Vice* admission revoked.
9. Applicant never has had any certificate or privileged to appear and practice before any administrative body suspended or revoked.
10. Alabama counsel of record associated with Applicant in this case is S. Christopher Collier of the law firm of Hawkins & Parnell, LLP, with offices at 303 Peachtree Street, NE, Suite 4000, Atlanta, Georgia 30308, Telephone 404-614-7462, Fax 404-614-7500.
11. Applicant has never filed an application to appear *pro hac vice* in any Alabama case or court.
12. Applicant agrees to comply with the applicable statutes, laws and rules of this Court and will familiarize herself with and comply with the applicable Rules of Professional Conduct.
13. Applicant respectfully requests to be admitted to practice in the above-named Court for this case only.

Respectfully submitted on this 7th day of April, 2008.

HAWKINS & PARNELL, LLP



Christi Dickson Feeney
Applicant

4000 SunTrust Plaza
303 Peachtree Street, NE
Atlanta, Georgia 30308-3243
T (404) 614-7400
F (404) 614-7500

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Defendants.)

VERIFICATION

STATE OF GEORGIA

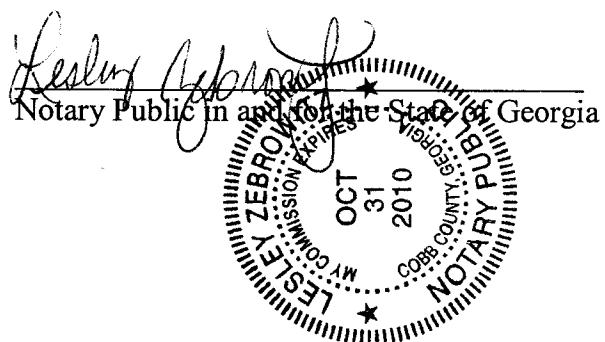
COUNTY OF FULTON)

I, Christi Dickson Feeney, do hereby swear or affirm under penalty of perjury that I am the Applicant of the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters expressly stated upon information and belief, and that as to those matters I believe them to be true.

Christi Dickson Feeney
Applicant

SUBSCRIBED AND SWORN TO before me on this 7th day of April, 2008.

My Commission Expires: 10/31/2010



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FOR THE MIDDLE DISTRICT OF ALABAMA
MONTGOMERY DIVISION

JENNIFER P. CLARK,)
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VS.) CIVIL ACTION NO. 2:08CV-173-MHT
)
)
JASON J. DEAL and)
E. PAUL STANLEY,)
)
Defendants.)

ALABAMA COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of Applicant Christi Dickson Feeney in this case pursuant to Rules Governing Admission *Pro Hac Vice* to this Court.

Respectfully submitted on this 7th day of April, 2008.

HAWKINS & PARNELL, LLP



S. Christopher Collier
Alabama Bar Number ASB-2343-C56S

4000 SunTrust Plaza
303 Peachtree Street, NE
Atlanta, Georgia 30308-3243
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JASON J. DEAL and)
E. PAUL STANLEY,)
Defendants.)

CERTIFICATE OF SERVICE

This is to certify that I have this day served all counsel of record in the foregoing matter with a copy of the forgoing **MOTION FOR ADMISSION PRO HAC VICE OF CHRISTI DICKSON FEENEY** by depositing a copy of the same in the United States Mail in an envelope with adequate postage thereon, addressed as follows:

Jennifer P. Clark
107 Saint Francis Street, #2403
Mobile, AL 36602
(251)432-7977 Phone
(251)432-7978 Fax

Pro Se Plaintiff

Robert C. Edwards
Assistant Attorney General
Office of the Attorney General
40 Capitol Square, S.W.
Atlanta, GA 30334-1300
(404)656-3370 Phone
(404)651-6920 Fax

Counsel for Defendant Judge Jason Deal

[Signature on following page]

Respectfully submitted on this 7th day of April, 2008.

HAWKINS & PARNELL, LLP



Christi Dickson Feeney
Applicant

4000 SunTrust Plaza
303 Peachtree Street, NE
Atlanta, Georgia 30308-3243
T (404) 614-7400
F (404) 614-7500

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VS.) CIVIL ACTION NO. 2:08CV-173-MHT
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JASON J. DEAL and)
E. PAUL STANLEY,)
)
Defendants.)

**ORDER GRANTING MOTION FOR ADMISSION *PRO HAC VICE*
OF CHRISTI DICKSON FEENEY**

On the ____ day of _____, 2008 came on for consideration the Motion for Admission *Pro Hac Vice* seeking the association of Applicant Christi Dickson Feeney in the above-styled and numbered case pursuant to applicable rules governing admission *Pro Hac Vice* in this Court. Upon consideration of the Motion and receipt of the required application fee, as review of evidence that Applicant is in good standing in the courts in which she is admitted to practice law and is not a resident of and/or licensed to practice law in this Court, this Court is of the opinion that the Motion should be GRANTED in its entirety.

IT IS HEREBY ORDERED that Applicant Christi Dickson Feeney shall be admitted, *Pro Hac Vice*, for the purposes of making appearances before the Court in this case only.

SIGNED THIS _____ DAY OF _____, 2008.

JUDGE PRESIDING

EXHIBIT “A”

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
MONTGOMERY DIVISION

JENNIFER P. CLARK,)
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Plaintiff,)
)
VS.) CIVIL ACTION NO. 2:08CV-173-MHT
)
)
JASON J. DEAL and)
E. PAUL STANLEY,)
)
Defendants.)

EXHIBIT "A": VERIFIED AFFIDAVIT OF CHRISTI DICKSON FEENEY
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE*

STATE OF GEORGIA)

COUNTY OF FULTON)

COMES NOW CHRISTI DICKSON FEENEY, and being first sworn under oath, states as follows:

1. "I am an adult resident of the State of Georgia, residing at 640 Hillpine Drive, Atlanta, Georgia 30306. I give this Affidavit in support of a Motion for Admission *Pro Hac Vice* filed in this Court. I am competent to give this Affidavit, I am over the age of 21 and of sound mind. All of the matters stated herein are of my own personal knowledge and, if called as a witness, I would and could testify competently thereto.
2. I make this declaration in support of my application to appear in this action *Pro Hac Vice* on behalf of Defendant E. Paul Stanley.
3. I am an attorney and a member of the law firm of Hawkins & Parnell, LLP with offices at 303 Peachtree Street, NE, Suite 4000, Atlanta, Georgia 30308, Telephone 404-614-7462, Fax 404-614-7500.

4. My law firm, Hawkins & Parnell, LLP, has been retained by Defendant E. Paul Stanley to provide legal representation in connection with the above case now pending before the above named Court.

5. Since 1996 I have been, and presently am, a member in good standing of the bar of the highest court of the State of Texas, where I regularly practice law. Attached is a Certificate of Good Standing. *See* Certificate of Good Standing from the State Bar of Texas, a true and correct copy of which is attached hereto as Exhibit "A-1".

6. Since 2003 I have been, and presently am, a member in good standing of the bar of the highest court of the State of Tennessee, where I regularly practice law.. Attached is a Certificate of Good Standing. *See* Certificate of Good Standing from the State Bar of Tennessee, a true and correct copy of which is attached hereto as Exhibit "A-2".

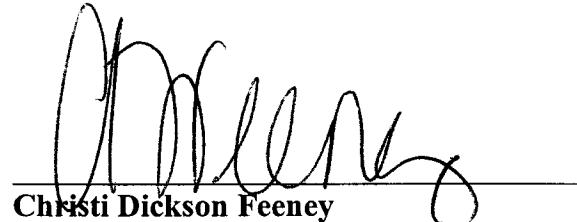
7. Since 2006 I have been, and presently am, a member in good standing of the bar of the highest court of the State of Georgia, where I regularly practice law. Attached is a Certificate of Good Standing. *See* Certificate of Good Standing from the State Bar of Georgia, a true and correct copy of which is attached hereto as Exhibit "A-3".

8. I have been admitted to practice before the following Courts, and I am presently a member in good standing of the bars of the following Courts:

<u>Court:</u>	<u>Admitted:</u>
State Bar of Texas	1996
United States District Court for the Northern District of Texas	1997
United States District Court for the Southern District of Texas	2001
United States District Court for the Eastern District of Texas	2002
United States Court of Appeals for the Fifth Circuit	2002

United States District Court for the Western District of Texas	2003
State Bar of Tennessee	2003
State Bar of Georgia	2006

9. I am not now, nor have I never been, licensed to practice law and/or any other professional activities in the State of Alabama. I am not now, nor have I ever been, regularly employed by and/or in the State of Alabama
10. I have never filed an application to appear *pro hac vice* in any Alabama case or court.
11. I have never had an application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked.
12. I have never had any certificate or privileged to appear and practice before any administrative body suspended or revoked.
13. I agree to comply with the applicable statutes, laws and rules of this Court and will familiarize myself with and comply with the applicable Rules of Professional Conduct. I consent to the jurisdiction of this court and Commission on Lawyer Conduct.
14. I respectfully request to be admitted to practice in the above named court for this case only."



Christi Dickson Feeney

SUBSCRIBED AND SWORN TO before me on this 7th day of April, 2008.

My Commission Expires: 10/31/2010

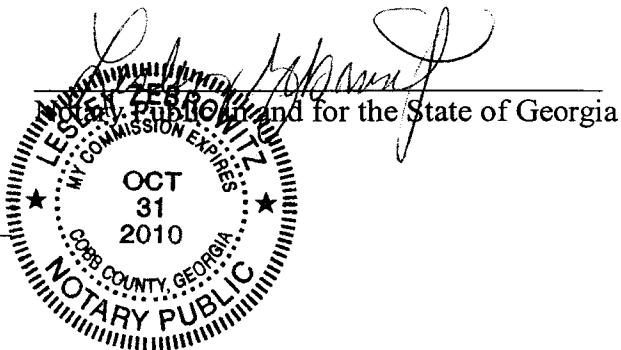


EXHIBIT “A-1”

STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

April 4, 2008

Sheryl Bogans
Hawkins & Parneil, LLP
4000 Suntrust Plaza
303 Peachtree Street, NE
Atlanta, GA 30308-3243

Re: Christi Dickson Feeney, Bar Card No. 00796468

To Whom It May Concern:

Pursuant to your request, I have researched our disciplinary records and report that we have no record of any complaints pending against the attorney listed above.

Ms. Feeney is active and in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues and attorney occupation tax; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension. She was accepted to the bar on November 1, 1996.

No previous disciplinary sanctions have been entered against Ms. Feeney's law license.

Please let me know if you need additional information or if I can be of further assistance to you.

Sincerely,

Sarah Saldaña
Administrative Assistant
Office of the Chief Disciplinary Counsel
State Bar of Texas

EXHIBIT “A-2”

CLERK OF THE SUPREME COURT
STATE OF TENNESSEE

I, Michael W. Catalano, Clerk of the Supreme Court, do hereby certify that CHRISTI DICKSON FEENEY is a licensed and practicing attorney of the Courts of this State, having taken the oath as prescribed by law, is enrolled as an attorney of this Court, and is in good standing. The Supreme Court is the Court of last resort in Tennessee.

Date of Enrollment: December 5, 2003.

In testimony whereof, I have set my hand and affixed the seal of the Court on this the 2nd day of April, 2008.

Michael W. Catalano, Clerk

By Lee Marsh D.C.

EXHIBIT “A-3”

STATE BAR OF GEORGIA



Lawyers Serving the Public and the Justice System

Ms. Christi Dickson Feeney
Hawkins & Parnell LLP
4000 SunTrust Plaza
303 Peachtree Street, N.E.
Atlanta, GA 30308

CURRENT STATUS: Active Member-Good Standing

DATE OF ADMISSION TO PRACTICE: 08/08/2006

Attorney Bar Number: 101009

Today's Date: April 1, 2008

Listed below are the public disciplinary actions, if any, which have been taken against this member:

State Disciplinary Board Docket #	Supreme Court Docket #	Disposition
N/A	N/A	N/A

The prerequisites for practicing law in the State of Georgia are as follows:

- Must be certified by the Office of Bar Admissions, either by Exam, or on Motion (Reciprocity).
- Sworn in to the Superior Court in Georgia, which is the highest court needed for individuals to practice law in the State of Georgia.
- Enrolled with the State Bar of Georgia, which is an arm of the Supreme Court of Georgia.

Attorneys licensed in Georgia and whose membership is current are eligible to practice law in Superior Court. Attorneys may, upon application, apply for admission to the Supreme, District and State Court of Appeals.

Under the privacy/confidentiality provision of the Bar Rule 4-221(d), any complaint against a member resolved prior to the filing and docketing of a disciplinary case in the Supreme Court is not a matter of public record, and may not be revealed without a waiver from the member. It is the policy of the State Bar of Georgia to answer any inquiry about a member by disclosing only those complaints that have been docketed in the Supreme Court. With respect to matters that are currently pending as active, undocketed cases, when an inquiry is received, the State Bar of Georgia shall not disclose the existence of those complaints. Such non-disclosure should not be construed to confirm the existence of confidential complaints since the vast majority of members in good standing are not the subjects of such confidential complaints.

This member is currently in "good standing" as termed and defined by State Bar Rule 1-204. The member is current in license fees and is not suspended or disbarred as of the date of this letter.

STATE BAR OF GEORGIA

Official Representative of the State Bar of Georgia

HEADQUARTERS

104 Marietta Street, Suite 100
Atlanta, Georgia 30303
(404) 527-8700 ■ (800) 334-6865
FAX (404) 527-8717
www.gabar.org

SOUTH GEORGIA

244 E. Second Street (Zip 31794)
P.O. Box 1390
Tifton, Georgia 31793-1390
(229) 387-0446 ■ (800) 330-0446
FAX (229) 382-7435

EXHIBIT “B”

STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

April 4, 2008

Sheryl Bogans
Hawkins & Parnell, LLP
4000 Suntrust Plaza
303 Peachtree Street, NE
Atlanta, GA 30308-3243

Re: Christi Dickson Feeney, Bar Card No. 00796468

To Whom It May Concern:

Pursuant to your request, I have researched our disciplinary records and report that we have no record of any complaints pending against the attorney listed above.

Ms. Feeney is active and in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues and attorney occupation tax; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension. She was accepted to the bar on November 1, 1996.

No previous disciplinary sanctions have been entered against Ms. Feeney's law license.

Please let me know if you need additional information or if I can be of further assistance to you.

Sincerely,

Sarah Saldaña
Administrative Assistant
Office of the Chief Disciplinary Counsel
State Bar of Texas

EXHIBIT “C”

CLERK OF THE SUPREME COURT
STATE OF TENNESSEE

I, Michael W. Catalano, Clerk of the Supreme Court, do hereby certify that CHRISTI DICKSON FEENEY is a licensed and practicing attorney of the Courts of this State, having taken the oath as prescribed by law, is enrolled as an attorney of this Court, and is in good standing. The Supreme Court is the Court of last resort in Tennessee.

Date of Enrollment: December 5, 2003.

In testimony whereof, I have set my hand and affixed the seal of the Court on this the 2nd day of April, 2008.

Michael W. Catalano, Clerk

By *Lia Marsh* D.C.

EXHIBIT “D”



STATE BAR OF GEORGIA

Lawyers Serving the Public and the Justice System

Ms. Christi Dickson Feeney
Hawkins & Parnell LLP
4000 SunTrust Plaza
303 Peachtree Street, N.E.
Atlanta, GA 30308

CURRENT STATUS: Active Member-Good Standing

DATE OF ADMISSION TO PRACTICE: 08/08/2006

Attorney Bar Number: 101009

Today's Date: April 1, 2008

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STATE BAR OF GEORGIA

Official Representative of the State Bar of Georgia

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